Jane Henney, Commissioner
Food and Drug Administration
Docket #ooP-1211/CP1
5630 Fishers Ln., Room 1061 (HFA -305)
Rockville, MD 20852

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Ms. Henney,

I am writing you because I am extremely concerned that there is no comprehensive government regulation o genetically engineered foods but we have been eating them for 4 years.

These foods have many potential problems and have never been proven to be safe for human or animal consumption. This is less than protective of American citizens and is an unacceptable situation.

Already there are 70 million acres of US farmland planted with GE seeds and most national brands can't guarantee their products don't contain GE foods. Once these seeds are released into US cropland and nature, they can't be recalled.

The list of other problems with GE foods risks include:

- Loss of biodiversity as only a few varieties of crops are used extensively;
- Genetic "drift" as pollen of altered plants mingles with traditional varieties:
- Increased allergies and other potential health problems;
- Greater reliance on chemicals and pesticides required for GE crops;
- Control of the world's seeds through patents owned by a few corporations.

I am asking that the Food and Drug Administration require that:

- No new genetically-engineered foods or products with GE ingredients be released until the FDA requires long-term safety testing of all GE foods before they go on the market.

- All GE foods presently on the market be labeled, giving consumers the right to know what's in the food on the market shelves. Then the consumers can choose whether they want to put those foods in their or their childrens' bodies.

Monsanto -- the clear leader in genetically engineered crops -- argues that genetic engineering is necessary (nay, ESSENTIAL) if the world's food supply is to keep up with human population growth. Without genetic engineering, billions will starve, Monsanto says. However, neither Monsanto nor any of the other

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genetic engineering companies appears to be developing genetically engineered crops that might solve global food shortages. Quite the opposite.

If genetically engineered crops were aimed at feeding the hungry, then Monsanto and the others would be developing seeds with certain predictable characteristics: (a) ability to grow on substandard or marginal soils; (b) plants able to produce more high-quality protein, with increased per-acre yield, without increasing the need for expensive machinery, chemicals, fertilizers, or water; (c) they would aim to favor small farms over larger farms; (d) the seeds would be cheap and freely available without restrictive licensing; and (e) they would be for crops that feed people, not meat animals.

None of the genetically engineered crops now available, or in development (to the extent that these have been announced) has any of these desirable characteristics. Quite the opposite. The new genetically engineered seeds require high-quality soils, enormous investment in machinery, and increased use of chemicals. There is evidence that their per-acre yields are about 10% lower than traditional varieties (at least in the case of soybeans),[1,pg.84] and they produce crops largely intended as feed for meat animals, not to provide protein for people. The genetic engineering revolution has nothing to do with feeding the world's hungry.

The plain fact is that fully two-thirds of the genetically engineered crops now available, or in development, are designed specifically to increase the sale of pesticides produced by the companies that are selling the genetically engineered seeds.[1,pg.55] For example, Monsanto is selling a line of "Roundup Ready" products that has been genetically engineered to withstand heavy doses of Monsanto's all-time top money-making herbicide, Roundup (glyphosate). A Roundup Ready crop of soybeans can withstand a torrent of Roundup that kills any weeds competing with the crop. The farmer gains a $20 per acre cost-saving (compared to older techniques that relied on lesser quantities of more expensive chemicals), but the ecosystem receives much more Roundup than formerly. To make Roundup Ready technology legal, EPA had to accommodate Monsanto by tripling the allowable residues of Roundup that can remain on the crop.[1,pg.75] Monsanto's patent on Roundup runs out in the year 2000, but any farmer who adopts Roundup Ready seeds must agree to buy only Monsanto's brand of Roundup herbicide. Thus Monsanto's patent monopoly on Roundup is effectively extended into the foreseeable future -- a shrewd business maneuver if there ever was one. However, this should not be confused with feeding the world's hungry. It is selling more of Monsanto's chemicals and filling the corporate coffers, which is what it was intended to do. "Feeding the hungry" is a sales gimmick, not a reality.

Monsanto's other major line of genetically engineered crops contains the gene from a natural pesticide called Bt. Bt is a naturally-occurring soil organism that kills many kinds of caterpillars that like to eat the leaves of crops. Bt is the pesticide of choice in low-chemical-use farming, IPM [integrated pest management] and organic farming. Farmers who try to minimize their use of synthetic chemical pesticides rely on an occasional dusting with Bt to prevent a crop from being overrun with leaf-eating caterpillars. To them, Bt is a God-send, a miracle of nature.

Monsanto has taken the Bt gene and engineered it into cotton, corn and potatoes. Every cell of every plant contains the Bt gene and thus produces the Bt toxin. It is like dusting the crop heavily with Bt, day after day after day. The result is entirely predictable, and not in dispute. When insect pests eat any part of these crops, the only insects that will survive are those that are (a) resistant to the Bt toxin, or (b) change their diet to prefer other plants to eat, thus disrupting the local ecosystem and perhaps harming a neighboring farmer's crops.

According to Dow Chemical scientists who are marketing their own line of Bt-containing crops, within 10 years Bt will have lost its usefulness because so many insects will have developed resistance to its toxin [1,pg.70]. Thus Monsanto and Dow are profiting bountifully in the short term, while destroying the usefulness of the one natural pesticide that undergirds the low-pesticide approach.

Thank you for your consideration of this very important matter

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cc Representative Sam Farr,
Senator Diane Feinstein

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